

**REMARKS/ARGUMENTS**

These remarks are made in response to the Office Action of May 29, 2007 (Office Action). As this response is timely filed within the 3-month shortened statutory period, no fee is believed due. Nonetheless, the Office is expressly authorized to charge any deficiencies and credit any overpayments to Deposit Account No. 50-0951.

On the basis of new grounds of rejection noted at page 2 of the Office Action, each of the claims was rejected. Claims 1, 2, 4, 8, 11, 14, and 17 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 7,203,761 to Rai, *et al.* (hereinafter Rai). Claims 5-7, 10, 13, 16, and 19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Rai in view of U.S. Patent 6,302,326 to Symonds, *et al.* (hereinafter Symonds).

Although Applicants respectfully disagree with the rejections, Applicants nevertheless have amended the claims so as to expedite prosecution of the present application by further emphasizing certain aspects of the invention. Applicants respectfully note, however, that the amendments are not intended as a surrender of any subject matter. Accordingly, Applicants expressly reserve the right to present the original version of any of the amended claims in any future divisional or continuation applications based on the present application.

In particular, Applicants have amended independent Claims 1, 8, 11, 14, and 17. As discussed in the following section, the claim amendments are fully supported throughout the Specification. No new matter has been introduced by virtue of the claim amendments presented.

**Certain Aspects Of The Invention**

It may be useful at this juncture to reiterate certain aspects of Applicants' invention. One embodiment of the invention, typified by amended Claim 11, is a method of routing data repository messages. The method can include receiving a data repository message

from an originating computer system, wherein the data repository message can conform to a first syntax and can be received in a message router remotely located from the originating computer system.

The method further can include recognizing the first syntax corresponding to the data repository of the originating computer system. More particularly, this recognition can be made based upon data contained in the data repository message itself. (See, e.g., Specification, p. 9, lines 14-28.)

Additionally, the method can include determining a target computer system to which the received data repository message is directed, wherein the target computer system can be remotely located from both the originating computer system and the message router. Moreover, the determination of the identity of the target computer system can be made based upon the data contained in the data repository message itself. (See, e.g., Specification, p. 12, lines 8-13; see also p. 10, line 29 – p. 11, line 2.)

Based on the determined target computer system, which as noted is explicitly determined on the basis of the data contained in the data repository message itself, a second syntax corresponding to the target computer system can be identified. Moreover, the first syntax and the second syntax can be different.

The method further can include converting content in the received data repository message from the first syntax to the second syntax, wherein the conversion can be effected by the message router and can be based upon syntax information contained in a translation library residing on the message router. The method also can include sending the received and converted data repository message to the target computer system.

#### **The Claims Define Over The Cited Reference**

As already noted, each of the claims was rejected as being anticipated by Rai. Rai is directed to an apparatus and related method for routing data to and from a user when the user is located in one of a plurality of different data networks. (See, e.g., Col. 2, lines

3-8.) One aspect of Rai is that characteristics associated with the particular "foreign" network to which the user is connected can be retrieved from a data store, and communications data exchanged with the user can be "adapted" so as to be "compatible with the retrieved characteristics." (Col. 2, lines 8-19.)

Applicants note, however, that there are fundamental differences between Rai and Applicants' invention. For example, Rai's communication functions are only applicable when a "mobile node" is not connected to its "home network" and is instead temporarily operating in a "foreign network." (Col. 3, line 66 – Col. 4, line 3.) A salient feature of Rai, therefore, is that the mobile node, when it has moved from its home network to the foreign network, must register its location so as to obtain data communications:

"When the mobile node 7 is temporarily moved to a first foreign network 2, as shown by the dotted box in FIG. 1a, it obtains a temporary care-of address on the foreign network 2. This can be a foreign agent care-of address, which is the IP address of the foreign agent, obtained by receiving or soliciting Agent Advertisements from any foreign agents based on the foreign network 2. Alternatively, the care-of address may be obtained by using an external assignment mechanism, such as Dynamic Host Configuration Protocol (DHCP) (the reader is referred to RFC 1541 for further information), in which case it is known as a co-located care-of address.

The mobile node 7 then registers its new care-of address with its home agent 8 by exchanging Registration Request and Registration Reply messages with it. Registration provides a mechanism by which mobile nodes can communicate their current reachability information to their home agent. The registration process is described in more detail below, assuming that the mobile node 7 on the foreign network 2 is registering a foreign

agent care-of address received via an Agent Advertisement from, for example, first foreign agent 9." (Col. 3, line 67 – Col. 4, line 21.)

It follows that even though Rai adapts a message to account for the characteristics of the foreign network, Rai does so based upon the identify of the foreign network as made known through this "registration process."

Applicants invention is fundamentally different, therefore, in several respects. First, rather than identifying the identity of the target system by an advance registration process, as with Rai, Applicants' invention instead identifies the target system from the data contained in a data repository message itself, as expressly recited in Claims 1, 8, 11, 14, and 17. That is, with Applicants' invention, an originating system, without first sending a separate registration message, simply sends a data repository message, and on the basis of the data contained in the data repository message itself, the target system for which the message is intended is identified.

Moreover, since Rai relies on the mobile user's preliminary registration, Rai has no need to also expressly identify the syntax of an originating computer system, as further recited in Claims 1, 8, 11, 14, and 17. Indeed, Rai does not even need to explicitly consider the syntax of a message sent to the user. Rai knows in advance, based upon the registration process, the characteristics of the foreign network to which the mobile unit is currently connected. Accordingly, Rai need only perform a conversion to meet those particular characteristics. (See, e.g., Col. 5, lines 26-41.)

Additionally, Applicants' invention determines the identity of the target computer system from the data of a repository message itself. Because the identity dictates the syntax used by the target computer system, it follows that the syntax of the target computer system is determined, according to Applicants' invention, from data contained in the data repository message itself, as also recited in Claims 1, 8, 11, 14, and 17. Rai is fundamentally different in that it is by the mobile unit's earlier registration that the

foreign network to which the mobile unit is currently connected is determined. Thus, with Rai, it is this registration process that dictates the characteristics that must be considered for any data conversion pertaining to an incoming message. No such registration is required with Applicants' invention; instead the identity, and hence the syntax of the target computer system, is determined on the basis of the data repository message itself.

Accordingly, Rai fails to expressly or inherently teach every feature recited in Claims 1, 8, 11, 14, and 17. Applicants respectfully assert, therefore, that independent Claims 1, 8, 11, 14, and 17 define over the prior art. Applicants further respectfully assert that, whereas each of the remaining claims depends from Claim 1, 8, 11, 14, or 17 while reciting additional features, these dependent claims likewise define over the prior art.

### CONCLUSION

The Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,



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Date: August 29, 2007